ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

NOV 16 1994

SUBJECT: Recommendation for Determination of Imminent and Substantial Endangerment
Walnut Avenue Lead Site
Roanoke, Virginia

FROM: Richard M. Fetzer, On-Scene Coordinator (3HW32)
Western Response Section

TO: Abraham Ferdas, Associate Division Director (3HW02)
for Superfund Programs

Because of the factors outlined below, I have determined that a threat to the public health or welfare or the environment exists at the Walnut Avenue Lead Site , and I recommend that a finding be made that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance at or from the Site.

1. Site Name and Location: Walnut Avenue Lead Site
Roanoke, Virginia

2. Owner/Operator: Cycle Systems

Cycle Systems reportedly purchased the Walnut Avenue property at a public auction in the early 1980's.

3. Population Information/Area Description:

The Site is situated adjacent to the Roanoke River in the City of Roanoke. The immediate area is industrial, but surrounded by densely populated urban areas.

4. Access is restricted by a fence, except for some areas along the river.

5. Coordination with Other Authorities:

__X__ State Contact: Steve Wright, VADEQ Roanoke
__X__ Local Contact: John Peters, City of Roanoke
__X__ Other Contact: Jim Carper, ACOE

EPA assistance was requested by both the City of Roanoke and the U.S. Army Corps of Engineers in assessing potential contamination associated with the joint flood control project. Representatives of Virginia Department

of Environmental Quality also participated in meetings with the City and the Corps related to this assessment.

6. Site Characteristics:

The Walnut Avenue Lead Site is used by an active recycling business, situated adjacent to the Roanoke River near the Walnut Avenue bridge in an industrialized section of downtown Roanoke, Virginia. Originally, the property was reportedly used in the manufacture of steel I-beams, but is now used primarily as a storage yard for various materials and equipment.

The Site is approximately 5 acres and fenced with a gate. Several adjoining buildings are onsite (see attached Site diagram). Hazardous substances specifically described below are located near the building and in some drainage areas, which were sampled.

7. Hazardous Substance(s) Present:

Prior to the Sale of the property to Cycle Systems, an environmental assessment of the property was conducted for the land owner, Dominion Bank (currently First Union Bank). This assessment revealed the following 3 areas of contamination: a slag/paint area adjacent to the river, an area of heavy metals contamination under a roof cover (allegedly area of former steel fabrication), and potential underground storage tank contamination. Following the purchase, Cycle Systems reportedly spent an estimated $90,000 to conduct cleanup efforts on the property.

Analytical data from the EPA sampling assessment revealed elevated levels of lead (5,110 ppm Sample CSS-32) in onsite soils; elevated levels of lead (4,660 ppm Sample CSS-30) in a drainage area near the drum storage area; in addition, elevated lead levels of lead (1,080 ppm Sample CSS-28) were detected in a drainage path leading directly to the Roanoke River, approximately 10 feet from the sampling location. Further sampling may be necessary to quantify the amount of contaminated soils present onsite. Lead is defined as a hazardous substance pursuant to CERCLA Section 104(14) and is listed in 40 CFR Part 302.4 as a hazardous substance. The Removal Action Level for lead is currently 1,000 ppm for industrial properties.

8. Threat to Public Health or Welfare or the Environment: (References are to Section 300.415 of the NCP)

A. 300.415 (b)(2)(i)

"Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants"

The presence of elevated levels of lead detected both onsite and in drainage pathways leading directly to the Roanoke River create the potential for direct contact to any person or animal that comes onsite; the facility is currently active, thus posing a threat to any employees who may come into contact with the contaminated soils. In addition, runoff from the Site enters directly into the Roanoke River creating a threat to aquatic organisms. Thus, there is potential exposure of humans, animals and fish in the immediate area of the Site. In addition, residents using the river for recreational purposes such as boating and fishing could be exposed since they are not restricted from access to the river.

B. 300.415 (b)(2)(ii)

"Actual or potential contamination of drinking water supplies or sensitive ecosystems"

With the Site being adjacent to the Roanoke River, heavy rains or flooding conditions could cause contaminants to migrate from the Site, thus impacting the river and its aquatic organisms. Although no drinking water supplies have been identified downstream, sediment dwelling organisms and fish may be contaminated due to offsite migration of lead-contaminated soil.

C 300.415 (b)(2)(iv)

"High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate"

The Removal Assessment revealed elevated concentrations of lead in the surface soils collected from both onsite and in drainage pathways; runoff from this Site directly enters the Roanoke River creating the potential for further contaminant migration. Levels onsite were found to be 5 times the Removal Action Level (RAL) for lead. The lead level in soil in the drainage pathway is 1,080 ppm and is above the RAL.

D. 300.415 (b)(2)(v)

"Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"

Since the Site is situated adjacent to the Roanoke River, the potential for flooding to occur exists; in addition, floods have occurred in the past which have left much of the City of Roanoke under several feet of water. Conditions such as this could probably result in offsite migration of contaminants.

E. 300.415 (b)(2)(vii)

"The availability of other appropriate Federal or State response mechanisms to respond to the release"

EPA assistance at this Site was requested because the City of Roanoke and the Army Corps of Engineers had exhausted their resources and could not afford further investigation at this time at the sites associated with the Flood Reduction Project including Walnut Avenue Lead Site. In addition, State or City funding is unavailable at this time to conduct any removal activities.

9. List of Supporting Documents:

A. Roanoke River Flood Reduction Project - Phase II A Interim Report, January 8, 1993, Prepared for City of Roanoke by Dewberry and Davis.

B. Roanoke River Flood Reduction Project - Proposed Allowable Concentrations; June 24, 1993; Prepared for City of Roanoke by Dewberry and Davis.

C. Roanoke River Control Site Analytical Package; June 1994; Prepared for EPA by Roy F. Weston Technical Assistance Team (TAT).

Action by the Approving Official:

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may

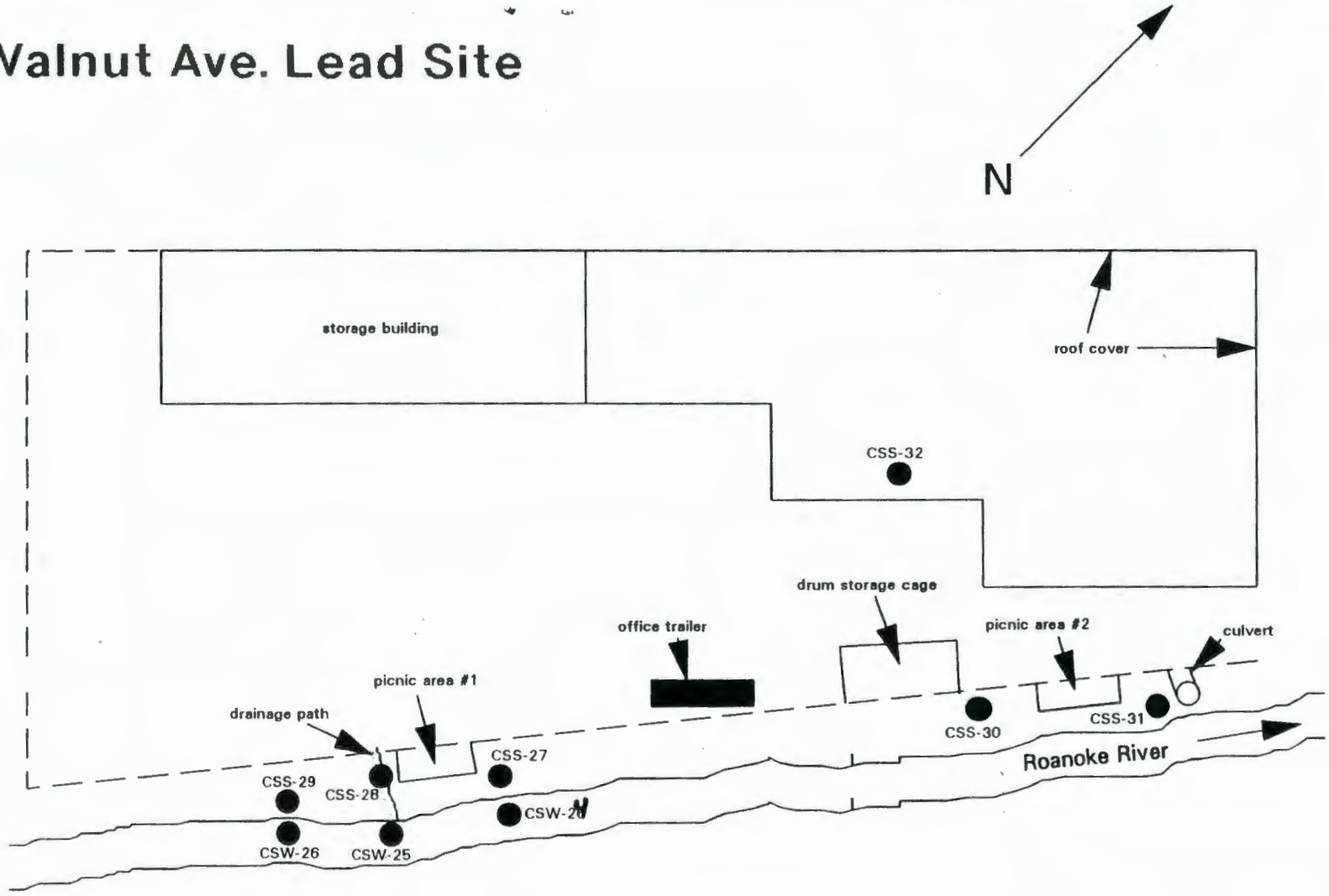
present an imminent and substantial endangerment to the public health or welfare or to the environment.

Kenneth R Rypzegun

for Abraham Ferdas
Associate Division Director
for Superfund Programs

11/15/94
Date

Walnut Ave. Lead Site



Sample Location Map

Not To Scale
Drawn By Region III TAT